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*Attorneys for Debtors, Gibson Farms, Nature's Way Compost, LLC,
Gibson Investments, Wendell Lee Gibson and Paula Gibson*

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
AMARILLO DIVISION**

In Re:	§	
	§	
GIBSON FARMS	§	Case No. 20-20271-RLJ-11
Debtor.	§	
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In Re:	§	
	§	
NATURE'S WAY COMPOST,	§	Case No. 20-20272-RLJ-11
LLC	§	(Jointly Administered Under
Debtor.	§	Case No. 20-20271-RLJ-11)
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In Re:	§	
	§	
GIBSON INVESTMENTS	§	Case No. 20-20273-RLJ-11
Debtor.	§	(Jointly Administered Under
	§	Case No. 20-20271-RLJ-11)
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In Re:	§	
	§	
WENDELL LEE GIBSON and	§	Case No. 20-20274-RLJ-11
wife, PAULA GIBSON	§	(Jointly Administered Under
Debtors.	§	Case No. 20-20271-RLJ-11)

**DEBTORS' MOTION FOR COMPENSATION AND REIMBURSEMENT
OF EXPENSES OF CLINT BUMGUARDNER OF WT APPRAISAL, INC.
AS APPRAISERS FOR DEBTORS**

TO THE HONORABLE ROBERT L. JONES, U.S. BANKRUPTCY JUDGE:

NOW COME, GIBSON FARMS, NATURE'S WAY COMPOST, LLC, GIBSON
INVESTMENTS, and WENDELL LEE GIBSON and wife, PAULA GIBSON (the "Debtors")

the Debtors in the above-referenced bankruptcy proceeding, and files this Motion For Compensation and Reimbursement of Expenses of Clint Bumgardner of WT Appraisal, Inc. as Appraiser For Debtors, pursuant to 11 U.S.C. Section 330 and 503, and in support of such application would respectfully show the Court as follows:

1. The Debtors all filed for relief under Chapter 11 of the U.S. Bankruptcy Code on October 5, 2020 ("Petition Date").

2. On October 6, 2020, the Debtors filed Motions for Joint Administration of their cases under lead Case No. 20-20271-RLJ-11, Gibson Farms and an Order approving the Motion was entered on October 7, 2020.

3. On November 2, 2020, the Debtors filed its Motion To Employ Clint Bumgardner of W.T. Appraisal, Inc. as Real Estate Appraiser for Debtors [Docket #54], and an order granting same was entered by the U.S. Bankruptcy Court on December 23, 2020 [Docket #104].

SUMMARY OF AMOUNTS REQUESTED FOR FEES

4. Debtors are now seeking final approval from the Court to allow Clint Bumgardner of WT Appraisal, Inc. ("Bumgardner") to receive payment of the fees and expenses owing in the total amount of \$9,000.00.

5. For this request, Bumgardner is seeking reimbursement for time and expenses for conducting and preparing his appraisal of Debtors' farmland and pastureland located in Moore and Hartley Counties, Texas.

6. The services rendered and the costs and expenses incurred on behalf of the Debtors during the application period, for which compensation is being sought in this Motion,

were actual and necessary. The amount charged for fees is reasonable and necessary based on
Motion For Compensation and Reimbursement
of Expenses for WT Appraisal, Inc. as Appraiser
for the Debtors - Page 2

the nature, extent and value of the services and the amount of time spent providing the services.

7. The specific information contained on the attached Exhibit "A" is a synopsis of the particular services rendered.

SERVICES RENDERED SOLELY FOR THE DEBTORS;
NO FEE SHARING ARRANGEMENT

8. All professional services for which allowance and payment of compensation is requested were performed by Bumguardner for the Debtors and not on behalf of any creditor or any other committee or person. Bumguardner has not shared or agreed to share any compensation received or to be received by them for services rendered or in connection with this case with any person except with his employees in the ordinary course of his business.

WHEREFORE, PREMISES CONSIDERED, the Debtors request that the Court approve the Motion For Compensation and Reimbursement of Expenses For Clint Bumguardner of WT Appraisal, Inc. as Appraiser for the Debtors in the total amount of \$9,000.00. The Debtors additionally seeks such other and further relief at law or in equity as the Court may deem necessary and proper.

NOTICE OF OPPORTUNITY FOR OBJECTION

NO HEARING WILL BE CONDUCTED HEREON UNLESS A WRITTEN RESPONSE IS FILED WITH THE CLERK OF THE UNITED STATES BANKRUPTCY COURT, FEDERAL BUILDING, 205 EAST FIFTH STREET, ROOM 133 AMARILLO, TEXAS 79101-1559 BEFORE CLOSE OF BUSINESS ON MARCH 1, 2021, WHICH IS AT LEAST TWENTY ONE (21) DAYS FROM THE DATE OF SERVICE HEREOF.

ANY RESPONSE MUST BE IN WRITING AND FILED WITH THE CLERK, AND A COPY MUST BE SERVED UPON COUNSEL FOR THE MOVING PARTY PRIOR TO THE DATE AND TIME SET FORTH HEREIN.

IF NO HEARING ON SUCH MOTION IS TIMELY REQUESTED, THE RELIEF REQUESTED SHALL BE DEEMED TO BE UNOPPOSED, AND

**THE COURT MAY ENTER AN ORDER GRANTING THE RELIEF
SOUGHT.**

Respectfully Submitted,

MULLIN HOARD & BROWN, L.L.P.

P.O. Box 2585

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Facsimile: (806) 765-0553

Email: drl@mhb.com


/s/ David R. Langston

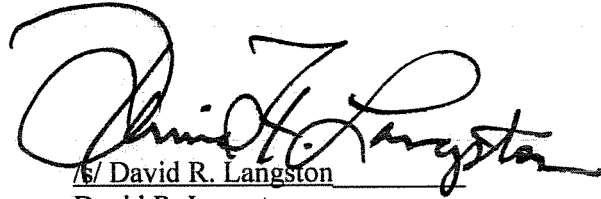
David R. Langston, SBN: 11923800

***Attorneys for Debtors, Gibson Farms, Nature'
Way Compost, LLC, Gibson Investments and
Wendell & Paula Gibson***

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing Motion was served on the following parties in interest via ECF and/or regular U.S. Mail on this 5 day of February, 2021:

1. * Wendell & Paula Gibson
Gibson Farms, Gibson Investments
and Nature's Way Compost, LLC
P.O. Box 777
Dumas, Texas 79029
Debtors
2. U.S. Trustee's Office
1100 Commerce St., Room 9C60
Dallas, Texas 75242
3. Clint Bumguardner
W.T. Appraisal, Inc.
P.O. Box 7275
Abilene, Tx. 79608
4. All parties receiving notice via
ECF in this case.


/s/ David R. Langston
David R. Langston

**SUMMARY SHEET FOR INTERIM FEE APPLICATION AS REQUIRED BY THE
GUIDELINES FOR REVIEWING FEE APPLICATIONS AND REIMBURSEMENT OF
EXPENSES UNDER 11 U.S.C. §330 PROMULGATED BY THE U.S. TRUSTEE'S
PROGRAM (SEE APPENDIX TO 28. C.F.R. §58)**

Total Compensation Requested in First Interim Fee Application:	\$9,000.00		
Total Compensation and Expenses Previously Requested:	None		
Total Compensation and Expenses Previously Awarded By the Court:	None		
Name and Applicable Billing Rate for each person who billed time during the period	Consultant	Applicable Billing Rate	
	Clint Bumgaardner		
Total Hours Billed and total amount of Billing for Each Person Who Billed Time during the billing period:	Consultant Hours Billed	Total Number of Billed	Total Amount
	Clint Bumgaardner		\$9,000.00

INVOICE**WT Appraisal, Inc.****INVOICE # 2020-545****DATE: OCTOBER 5, 2020**

P. O. Box 7275, Abilene, Texas 79608
 Phone (800)340-5039 Fax (325) 692-1587
 www.wtappraisal.com

TAX ID #: 75-2650569

To Mr. David R. Langston
 Mullin Hoard & Brown, LLP
 1500 Broadway, Suite 700
 Lubbock, Texas 79401

APPRAISER	JOB	SHIPPING METHOD	REQUESTED BY	PAYMENT TERMS
AC	20-545	Email	Mr. Langston	Due on receipt

SERVICE TYPE	NO. OF COPIES	DESCRIPTION	TOTAL
Appraisal		2,830.29 Acres of Irrigated Farmland and Native Pastureland With Rural Agricultural Improvements Located West and South of Dumas, Moore & Hartley Counties, Texas	\$9,000
TOTAL FEE:			\$9,000

Make all checks payable to WT Appraisal, Inc.
DUE UPON RECEIPT!
THANK YOU FOR YOUR BUSINESS!

EXHIBIT "A"